



*Consulting Engineers  
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October 5, 2012  
(PBW Project No. 1651)

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

Mr. Chris Villarreal  
Remedial Project Manager, 6SF-RA  
U.S. Environmental Protection Agency Region 6  
1445 Ross Avenue  
Dallas, Texas 75202

Re: Bi-Monthly Progress Report, R&H Oil/Tropicana Energy Site, San Antonio, Texas

Dear Mr. Villarreal:

Pursuant to Section IX, Paragraph 37 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this bi-monthly progress report on behalf of the Respondents named in the Settlement Agreement. In accordance with the Settlement Agreement requirements, this progress report addresses the topics listed below:

1. Actions which have been taken to comply with the Settlement Agreement during the preceding two-month period – The following actions were taken during the previous two-month period:
  - A groundwater gauging and LNAPL thickness measurement event was conducted at the Site on August 23, 2012. LNAPL was bailed from wells containing >1.5 ft of LNAPL in-well thickness. The results of the gauging event are provided in the attached data tables.
  - A groundwater gauging and LNAPL thickness measurement event was conducted at the Site on September 26, 2012. LNAPL was bailed from wells containing >1.5 ft of LNAPL. The results of the gauging event are provided in the attached data tables.
  - PBW prepared and submitted a letter to EPA on August 31, 2012 pursuant to Section XI, Paragraph 50 of the Settlement Agreement to express concerns regarding data from vapor samples collected by EPA's oversight contractor during May 2012 sampling activities.
  - During a meeting held between PBW and Chris Villarreal on September 12, 2012, PBW provided EPA with a binder of hard copies of all environmental data collected to date as part of the RI. This binder was subsequently provided to the TCEQ on September 13.

- A conference call was held on September 19, 2012 between PBW, Chris Villarreal and Kenneth Shewmake to discuss comments received on the Draft Screening Level Ecological Risk Assessment (SLERA) provided by Chris Villarreal via email on September 5, 2012.
2. Quality-assured results of sampling, tests and all other quality-assured data received by Respondents during the preceding two-month period – No quality-assured data were received during the preceding two-month period.
3. Work planned for next two months with schedules relating such Work to the overall project schedule for RI/FS completion – The following work is planned for the next two months:
- A site-wide mowing event and fence maintenance/repair activities are scheduled to be completed the first week of October 2012.
  - Additional soil gas sampling activities, including repair/replacement of sample point SG-22 will be performed in the next two months.
  - Monthly groundwater gauging and LNAPL recovery will be conducted in the next two months.
  - Preparation of the RI Report, Baseline Human Health Risk Assessment and Feasibility Study are ongoing.
  - Discussions with EPA and TCEQ regarding the Screening Level Ecological Risk Assessment are ongoing.
- The planned schedule for this work is generally consistent with the overall RI/FS schedule provided in the approved RI/FS Work Plan.
4. Problems encountered, anticipated problems, actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays – No problems or delays were encountered or anticipated during the preceding two-month period.

Thank you for the opportunity to submit this progress report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor P.E.  
Principal Engineer



Tim Nickels  
Project Scientist

Attachments:

Table 1 Monitoring Well Gauging Summary - August 23, 2011

Table 2 Monitoring Well Gauging Summary - September 26, 2011

cc: Marilyn Long – TCEQ  
Leslie Alexander – de maximis, inc.  
Brad Bredesen – Structural Metals, Inc.  
Lee Bishop – Exxon Mobil Corporation  
Heather Corken – Fulbright & Jaworski, LLP  
Gary Elkin – BAE Systems Resolution, Inc.  
Jack Healy – Perkin Elmer Automotive Research, Inc.  
Heidi Hughes Bumpers – Jones Day  
Larry King – Flint Group Incorporated  
Paul Kirkpatrick – Structural Metals, Inc.  
Earl Moran – Exxon Mobil Corporation  
James Morriss, III – Thompson & Knight, LLP  
Duane Ness – Flint Group Incorporated  
Eva O'Brien - Fulbright & Jaworski, LLP  
Mary Smith - Office of the Attorney General of Texas  
Robert Sterrett – Itasca Denver, Inc.  
Rudy Valdes – National Radiator  
Elizabeth Webb – Thompson & Knight, LLP

**TABLE 1**  
**MONITORING WELL GAUGING SUMMARY - August 23, 2012**  
R&H Oil Company/Tropicana Energy Site, San Antonio, Texas

Well ID	Date	Screen Interval (ft, BGS)	Measuring Point Elevation (ft, MSL)	Depth to Water (ft, BMP)	Depth to LNAPL (ft, BMP)	NAPL Thickness (ft)	Water Level Elevation (ft, MSL)	Corrected Water Level Elevation (ft, MSL)
MW-1	8/23/2012	10-40	657.29	20.52	ND	--	636.77	636.77
MW-2	8/23/2012	11-42	659.25	22.71	ND	--	636.54	636.54
MW-3	8/23/2012	10-48	657.34	22.37	20.36	2.01	634.97	636.54
MW-4	8/23/2012	10-44	660.21	23.38	ND	--	636.83	636.83
MW-5	8/23/2012	10.5-43	656.93	20.74	20.26	0.48	636.19	636.56
MW-6	8/23/2012	10-54.5	656.95	21.47	20.15	1.32	635.48	636.51
MW-7	8/23/2012	30-45	655.13	18.73	ND	--	636.40	636.40
MW-8	8/23/2012	30-45	654.42	18.60	ND	--	635.82	635.82
MW-9	8/23/2012	25-40	654.17	17.88	ND	--	636.29	636.29
MW-10	8/23/2012	23-38	653.57	17.40	ND	--	636.17	636.17
MW-11	8/23/2012	25-40	654.55	18.13	ND	--	636.42	636.42
MW-12	8/23/2012	10-25	659.90	22.72	22.39	0.33	637.18	637.44
MW-13	8/23/2012	10-25	662.65	26.53	25.59	0.94	636.12	636.85
MW-14	8/23/2012	10-25	660.17	24.07	23.19	0.88	636.10	636.79
MW-15	8/23/2012	10-25	659.94	27.00	22.76	4.24	632.94	636.25
MW-16	8/23/2012	10-25	659.20	22.43	ND	--	636.77	636.77
MW-17	8/23/2012	10-25	659.23	22.98	22.71	0.27	636.25	636.46
MW-18	8/23/2012	10-25	660.60	24.57	23.36	1.21	636.03	636.97
MW-19	8/23/2012	10-25	658.37	22.16	21.7	0.46	636.21	636.57
MW-20	8/23/2012	10-30	659.38	22.66	ND	--	636.72	636.72
MW-21	8/23/2012	8-23	654.19	17.92	ND	--	636.27	636.27
MW-22	8/23/2012	10-25	654.07	18.07	ND	--	636.00	636.00
NMW-1	8/23/2012	10-25	662.30	25.25	24.99	0.26	637.05	637.25
NMW-2	8/23/2012	10-25	660.61	24.02	ND	--	636.59	636.59
NMW-3	8/23/2012	10-25	660.63	25.13	23.41	1.72	635.50	636.84
NMW-4	8/23/2012	10-25	660.99	24.27	24.16	0.11	636.72	636.81
NMW-5	8/23/2012	10-25	660.45	23.66	ND	--	636.79	636.79

Notes:

1. Water levels in wells containing LNAPL were corrected using an LNAPL specific gravity of 0.78 as determined from analysis of LNAPL collected at well NMW-3.
2. LNAPL was bailed from monitoring wells containing >0.5-inches of LNAPL.
3. ND - Measurable LNAPL thickness not greater than 0.01 feet. MSL = Mean sea level.

**TABLE 2**  
**MONITORING WELL GAUGING SUMMARY - September 26, 2012**  
R&H Oil Company/Tropicana Energy Site, San Antonio, Texas

Well ID	Date	Screen Interval (ft, BGS)	Measuring Point Elevation (ft, MSL)	Depth to Water (ft, BMP)	Depth to NAPL (ft, BMP)	NAPL Thickness (ft)	Water Level Elevation (ft, MSL)	Corrected Water Level Elevation (ft, MSL)
MW-1	9/26/2012	10-40	657.29	20.19	ND	--	637.10	637.10
MW-2	9/26/2012	11-42	659.25	22.31	ND	--	636.94	636.94
MW-3	9/26/2012	10-48	657.34	21.22	20.29	0.93	636.12	636.85
MW-4	9/26/2012	10-44	660.21	22.41	ND	--	637.80	637.80
MW-5	9/26/2012	10.5-43	656.93	20.31	20.02	0.29	636.62	636.85
MW-6	9/26/2012	10-54.5	656.95	21.01	19.96	1.05	635.94	636.76
MW-7	9/26/2012	30-45	655.13	18.28	ND	--	636.85	636.85
MW-8	9/26/2012	30-45	654.42	18.56	ND	--	635.86	635.86
MW-9	9/26/2012	25-40	654.17	17.41	ND	--	636.76	636.76
MW-10	9/26/2012	23-38	653.57	16.93	ND	--	636.64	636.64
MW-11	9/26/2012	25-40	654.55	17.68	ND	--	636.87	636.87
MW-12	9/26/2012	10-25	659.90	22.93	22.61	0.32	636.97	637.22
MW-13	9/26/2012	10-25	662.65	26.79	25.59	1.2	635.86	636.80
MW-14	9/26/2012	10-25	660.17	23.36	22.93	0.43	636.81	637.15
MW-15	9/26/2012	10-25	659.94	24.34	22.86	1.48	635.60	636.75
MW-16	9/26/2012	10-25	659.20	22.31	ND	--	636.89	636.89
MW-17	9/26/2012	10-25	659.23	22.59	22.42	0.17	636.64	636.77
MW-18	9/26/2012	10-25	660.60	23.47	23.42	0.05	637.13	637.17
MW-19	9/26/2012	10-25	658.37	21.83	21.41	0.42	636.54	636.87
MW-20	9/26/2012	10-30	659.38	22.29	ND	--	637.09	637.09
MW-21	9/26/2012	8-23	654.19	17.47	ND	--	636.72	636.72
MW-22	9/26/2012	10-25	654.07	17.62	ND	--	636.45	636.45
NMW-1	9/26/2012	10-25	662.30	25.39	25.12	0.27	636.91	637.12
NMW-2	9/26/2012	10-25	660.61	23.54	ND	--	637.07	637.07
NMW-3	9/26/2012	10-25	660.63	24.16	23.21	0.95	636.47	637.21
NMW-4	9/26/2012	10-25	660.99	24.04	23.96	0.08	636.95	637.01
NMW-5	9/26/2012	10-25	660.45	23.23	ND	--	637.22	637.22

Notes:

1. Water levels in wells containing LNAPL were corrected using an LNAPL specific gravity of 0.78 as determined from analysis of LNAPL collected at well NMW-3.
2. LNAPL was bailed from monitoring wells containing >0.5-inches of LNAPL.
3. ND - Measurable LNAPL thickness not greater than 0.01 feet. MSL = Mean sea level.
4. BMP = Below measuring point. BGS = Below ground surface.